

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT PIERCE DIVISION**

Case No. 25-14146-CIV-CANNON

SARAH BROOKER

Plaintiff,

vs.

LEAK BUSTERS ROOF REPAIR LLC,
and WRC HOLDINGS LLC,

Defendants.

STATEMENT OF CLAIM

COMES NOW, Plaintiff, Sarah Brooker, by and through undersigned counsel, pursuant to the Order in Actions brought under the Fair Labor Standards Act, and files this Statement of Claim and says as follows:

1. Ms. Brooker worked for Defendants from May 1, 2024 to September 27, 2024 as a sales manager/sales representative/Project manger.
2. Ms. Brooker was entitled to the overtime rate for hours worked over forty in workweek during the entire course of his employment with Defendant(s).
3. Although Ms. Brooker worked 50 hours a week and she was paid overtime at the regular hourly rate and not time and half.
4. Ms. Brooker earned a salary of \$1,000.00 a week which works out to be approximately \$20.00 per hour. Ms. Brooker is owed approximately Two Thousand and One Hundred

(\$2,100.00) corresponding to two hundred and ten (210) overtime hours at \$10.00 per hour of half time during the period from May 01, 2024, to September 27, 2024.

5. Additionally, as per the contract between the parties, Ms. Brooker was hired as a sales manager, she would get paid by salary and commissions for 3% on every job after sale was completed or on 10% of self-generated jobs.
6. Ms. Brooker had a total of 15 jobs totaling \$225,843.84, at 3% she earned \$6,775.32 in commission. Moreover she also had 30 jobs totaling 302,209.68 that were self-generated so she earned 10% in commissions she earned \$30,220.97.
7. Ms. Brooker is owed a total of **Thirty-Six Thousand Nine Hundred and Ninety Six Dollars and Twenty-nine cents (\$36,996.29)**, corresponding to the unpaid commissions she was entitled to independent of her salary.

Dated May 27, 2025

Respectfully submitted,

By: /s/ Elvis J. Adan
Elvis J. Adan, Esq.
Fla. Bar No.: 24223
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 27, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/Elvis J. Adan
Elvis J. Adan, Esq.